## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

APR 1 2 2022

NATHAN OCHSNER CLERK OF COURT

UNITED STATES OF AMERICA

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**CRIMINAL NO. B-21-440-S2** 

JOSE SALINAS

VS.

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# SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

### **COUNT ONE**

On or about March 19, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

#### JOSE SALINAS,

did knowingly and intentionally open, lease, rent, use, and maintain a place, namely, a residence located at 2397 Quail Trail in Brownsville, Texas, for the purpose of distributing a controlled substance, that is, approximately 1 kilogram (2.2 pounds) of methamphetamine, and approximately 1 kilogram (2.2 pounds) of cocaine, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 856(a)(1), 856(b), 856(d), and Title 18, United States Code, Section 2.

### **COUNT TWO**

On or about March 19, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

JOSE SALINAS,

did knowingly and intentionally attempt to aid and abet possession with intent to distribute a quantity more than fifty (50) grams, that is, approximately 1 kilogram (2.2 pounds) of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

### **COUNT THREE**

On or about March 19, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

#### JOSE SALINAS,

did knowingly and intentionally attempt to aid and abet possession with intent to distribute a quantity more than more than 500 grams, that is, approximately 1 kilogram (2.2 pounds) of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

#### **COUNT FOUR**

On or about May 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

#### **JOSE SALINAS,**

did knowingly and intentionally attempt to open, lease, rent, use, and maintain a place, namely, a residence located at 2397 Quail Trail in Brownsville, Texas, for the purpose of distributing a controlled substance, that is, approximately 60 kilograms (132 pounds) of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 856(a)(1), 856(b), 856(d), and

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Title 18, United States Code, Section 2.

### **COUNT FIVE**

On or about May 6, 2020, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

### JOSE SALINAS,

did knowingly and intentionally attempt to aid and abet possession with intent to distribute a quantity more than 5 kilograms, that is, approximately 60 kilograms (132 pounds) of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

JENNIFER B. LOWERY UNITED STATES ATTORNEY

DAVID A. LINDENMUTH

Assistant United States Attorney